

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

Patrick Shearer,

Debtor

Ronda J. Winnecour, Esquire
Chapter 13 Trustee,

Movant

vs.

Patrick Shearer,

Respondents

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: CASE NO. 17-20883-GLT
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: CHAPTER 13
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: Related to Document No. 59
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: Hearing Date & Time:
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SUPPLEMENTAL STATEMENT TO RESPONSE TO TRUSTEE'S MOTION TO DISMISS

AND NOW comes the Debtor, Patrick Shearer, by and through his attorney, Paul W. McElrath, Esquire, of the law firm of McElrath Legal Holdings, LLC, and files the within *Brief Supplemental Statement*, and in support thereof aver as follows:

1. On May 2, 2022, the Trustee filed a motion to dismiss case for failure to complete the plan funding.
2. On May 22, 2022 the Debtor responded stating that the funds needed to complete the plan will be paid by the time of hearing.
3. Hearing was held on June 15, 2022, the Debtor needed \$294 to complete the case.
4. On June 17, 2022, Counsel sent the Debtor a letter regarding the outcome of the hearing and that funds of \$294 are needed to complete the case.
5. On June 22, 2022, Counsel had a telephone conversation with the Debtors wife. She stated that a check for \$400 was sent to the Trustee. Counsel informed her

that a money order should have been used as personal checks may be held for 30 days. These funds are not reflected on the trustee's website as being received.

6. On July 23, 2022, Counsel tried to contact the Debtor by telephone. There was no answer and a voice message was left.
7. On July 25, 2022, Counsel had a telephone conversation with the Debtor. Debtor stated that he will remit the remaining \$294 on July 27, 2022.

WHEREFORE, Counsel so reports to this Court.

Respectfully submitted,

Date: July 25, 2022

/s/ Paul W. McElrath
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